

PATRICK D. ROBBINS (CABN 152288)  
Acting United States Attorney  
PAMELA T. JOHANN (CABN 145558)  
Chief, Civil Division  
ELIZABETH D. KURLAN (CABN 255869)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7298  
Facsimile: (415) 436-6748  
elizabeth.kurlan@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JOHN DOE,

Plaintiff,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States of America, *et al.*,

Defendants

) Case No. 25-03140 JSW

) **STIPULATION TO EXTEND TIME TO ALLOW**  
) **THE PARTIES TO ENGAGE IN**  
) **NEGOTIATIONS FOR A POTENTIAL**  
) **RESOLUTION; [PROPOSED] ORDER**

S.Y., *et al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as  
Secretary of the United States Department of  
Homeland Security, *et al.*,

Defendants

) Case No. 4:25-cv-3244-JSW

ZHOUER CHEN, *et al.*

Plaintiff,

v.

) Case No. 4: 25-cv-3292-JSW

STIPULATION  
4:25-CV-03140 JSW and related cases

KRISTI NOEM, *et al.*,

## Defendants

SHANGSHANG WANG,

Plaintiff,

V.

KRISTI NOEM, *et al.*,

## Defendants

JUNGWON KIM, *et al.*,

Plaintiff,

V.

KRISTI NOEM, *et al.*,

## Defendants

W.B.

Plaintiff,

V.

KRISTI NOEM, *et al.*,

## Defendants

SKY QUI,

Plaintiff,

V.

TODD M. LYONS, in his official capacity as  
Acting Director of United States Immigration and  
Customs Enforcement,

Defendant.

## STIPULATION

4:25-CV-03140 JSW and related cases

EMMA BAI,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants

Case No. 4:25-cv-3481-JSW

J.C. *et al.*,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants.

Case No. 4:25-cv-3502-JSW

ARYAN SHAH, *et al.*,

Plaintiff,

v.

TODD M. LYONS,

Defendant.

Case No. 4:25-cv-3549-JSW

YIWEI HE,

Plaintiff,

v.

KRISTI NOEM, *et al.*,

Defendants.

Case No. 4:25-cv-3480 JSC

On May 6, 2025, the Court granted the parties stipulation to an extension of time for Defendants' supplemental opposition to Plaintiffs' motion for preliminary injunction, setting the deadline for Defendants' opposition on May 7, 2025, at 5:00 p.m. *See* Dkt. No. 55. The Court noted that "[t]here shall be no further extensions." *Id.*

Following the Court's order, Plaintiffs and Defendants have been actively engaged in negotiations for a potential resolution of these cases. The parties are negotiating in good faith but will need a brief period of additional time to determine if they can reach an agreement. Accordingly, the parties respectfully request the Court to grant an extension of time for Defendants' supplemental opposition to Plaintiffs' motions for preliminary injunction, and set the due date for Defendants' opposition to May 8, 2025, at 5:00 p.m. The parties are mindful of the Court's order and make this request because they believe it will benefit the parties and conserve the Court's resources to allow a brief period of additional time for the parties to pursue a potential resolution.

For *He v. Noem*, No. 4:25-cv-3480-JSW, the parties request that the Court set the due date for their joint status report to May 8, 2025. The parties respectfully request that the Court grant their stipulation.

Dated: May 7, 2025

Respectfully submitted,

PATRICK D. ROBBINS  
Acting United States Attorney

*s/ Elizabeth D Kurlan*  
ELIZABETH D. KURLAN  
Assistant United States Attorney

*Attorneys for Defendants*

Dated: May 7, 2025

*s/ John Nicholas Sinodis*  
JOHN NICHOLAS SINODIS  
Van Der Hout, LLP

*Attorney for Plaintiffs*

s/ Andre Y. Bates  
ANDRE Y. BATES  
DeHeng Law Offices PC

*Attorney for Plaintiff*

s/ Jesse M. Bless  
JESSE M. BLESS  
Bless Litigation

*Attorney for Plaintiffs*

s/ Ben Loveman  
BEN LOVEMAN  
Reeves Immigration Law Group

*Attorney for Plaintiff*

s/ Zachary R. New  
ZACHARY R. NEW  
Joseph and Hall P.C.

*Attorney for Plaintiff*

**[PROPOSED] ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendants will file their supplemental opposition to Plaintiffs' motion for preliminary injunction by May 8, 2025, at 5:00 p.m.

Date:

JEFFREY S. WHITE  
United States District Judge